

Tag Care Ltd

Privacy Notice

This privacy notice is issued under the Data Protection Act 2018 and the EU General Data Protection Regulation as it applies to the UK (the UK GDPR).

Definitions:

“We” or “us” means Tag Care Ltd

“the App” means the products made by us, whether software or a wearable item, and either licensed or sold directly or indirectly for the purpose of allowing essential health care information to be shared with family members or other people providing assistance to a Person of Concern, including healthcare workers or volunteers

“Person of Concern” means an individual who uses the App to store and make available health data, such data to be available to health care workers or volunteers through the use of the App

“Carer” means a business or an individual using the App for the benefit of a Person of Concern or a number of them

“Amigo” means an individual who provides support or comfort to the Person of Concern by way of text messages sent via the App

“commercial partner” means an entity associated with us for the purposes of promotion of and collecting payment for the App

1. Important information and who we are

Purpose of this privacy notice

This privacy notice gives you information on how Tag Care Ltd collects and processes your personal data.

It will explain how we collect and use personal data about you so that you are fully aware of how and why we do so.

Data Controller

Tag Care Ltd is the data controller for the purposes of the making available and maintaining the App, and is responsible for the use of your personal data to facilitate the service provided by the App. Tag Care Ltd is not responsible for any decisions to share personal data derived from the App which are made by a Person of Concern, a Carer, an Amigo or a commercial partner.

Contact details

If you have any questions about this privacy notice or our privacy practices, please contact us in one of the following ways:

E: privacy@tag.care

A: 77, Church Lane, Arlesey, SG15 6UX

T: 020 7078 4372

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with

your concerns before you approach the ICO so please contact us in the first instance.

Our registration number with the ICO is ZA609847

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. The latest version of this Privacy Notice can be accessed at: www.tag.care/privacy.html

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your usage of the App.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer the following kinds of personal data about you, depending on whether you are a Carer, a Person of Concern, an Amigo or a commercial partner of Tag Care Ltd:

- an email address and/or login details that may identify you
- contact data such as billing address or telephone number
- if you are the person paying a subscription fee for the usage of the App, or the commercial partner who has taken payment on our behalf, we may hold financial data such as bank account and payment card details, as well as relevant transaction data
- usage data about how you have used the App
- health data, if you are a Person of Concern.

3. How is your personal data collected?

The personal data we hold about you is limited to data we have received from direct interactions with our App or electronic links to our App.

- If you have downloaded the App as a Carer, a Person of Concern or an Amigo, you will either have registered for the App directly yourself, or you will have been invited to register by another person who may have provided us with your contact details in order to send you a link for you to register.
- If you are an Amigo or a Carer who has access to the App for administration purposes, your personal data may originally have been given to us by another person.
- Details of payment transactions may be given to us by the commercial partner who has collected those details on our behalf.

In almost all cases the personal data will be collected by us or transmitted to us by the use of electronic forms.

The consequence of not providing personal data is that the App will not function as intended.

4. How we use your personal data

We will only use your personal data when the law allows us to. The App is an automated service which relies upon personal data being given for the purposes of communications between the App maintained by us, the Person of Concern, any Carer, any Amigo and any commercial partner. Most commonly, we will use your personal data for the following purposes.

- If we have entered into a contract with you, ie if you are a commercial partner or if you are the account holder who is paying the subscription fee for the App, we will use your data for the performance of the contract we have entered into.
- If you are a user of the App (including a Carer, a Person of Concern or an Amigo), to register you as a user and to provide and to maintain the App service is necessary for our legitimate interests.
- Our legitimate interests in providing and maintaining the App service, and those of the Carer, the Person of Concern and the Amigo, as the case may be, include:
 - making the contact details of a Carer available via the App to third parties assisting the Person of Concern;
 - making the medical information of a Person of Concern, as entered by a Carer or that Person of Concern, available to third parties assisting the Person of Concern.
- Our app is designed, amongst other things, to protect the vital interests of the Person of Concern.
- If you are a Carer who has registered for the App, in addition to our legitimate interests and those of the Person of Concern detailed above, you will have specifically consented to the App making your contact details available to third parties assisting the Person of Concern.
- If you are a Person of Concern who has registered for the App, in addition to our legitimate interests and those of the Carer detailed above, you will have specifically consented to the App making your medical information available to third parties assisting you.

We do not use any automated decision-making process.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

In accordance with section 4, we may share your personal data with third parties for the purposes of the service which the App is designed to provide:

- if you are a Carer, so that you can be contacted by the Person of Concern or another person assisting the Person of Concern;

- if you are a Person of Concern, so that the App can provide third parties with the medical information that has been entered by you or by a Carer.

We do not transfer your personal data outside the UK.

6. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who either have a need to know or have been specifically authorised by you to have access to your personal data via the App.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

In some circumstances you can ask us to delete your data. See below for further information.

8. Your legal rights

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object if we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us with the details set out above.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

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